

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA**

SHANIKA CROWLEY,

Plaintiff,

vs.

Case No.: 24-CV-00544-CVE-MTS

FPI MANAGEMENT, INC., and  
ELLEN RICHARDS

Defendants.

**DISCLOSURE STATEMENT**

Pursuant to Fed. R. Civ. P. 7.1 and LCvR7.1-1:

Ellen Richards

*[enter name of party on the line above]*

who is a (check one) ☐ PLAINTIFF ☒ DEFENDANT ☐ OTHER: \_\_\_\_\_

in this action, makes the following disclosures:

**PART I: CITIZENSHIP (diversity cases only)**

- ☐ This party is an individual who is a citizen of the state of \_\_\_\_\_.
- ☐ This party is a corporation incorporated in \_\_\_\_\_ and with a principal place of business in \_\_\_\_\_.
- ☐ This party is a noncorporate entity (e.g., an unincorporated association, a sole proprietorship, a limited liability company, a joint venture, a general partnership, a limited partnership, a limited liability partnership, a business trust).

If yes, identify the nature of the entity, the members of the entity and the member's state of citizenship. If any member is itself a noncorporate entity, the citizenship for each sub-member of the noncorporate entity member must be provided as well.

- ☐ This party is a traditional trust.

If yes, identify each trustee and each trustee's state of citizenship. If any trustee is a noncorporate entity, the citizenship for each member of the noncorporate entity trustee must be provided as well.

**PART II: NONGOVERNMENTAL ENTITY DISCLOSURES (all cases)**

- ☐ This party is not publicly held and has no parents/subsidiaries, or any other ownership/relationships described below.

- ☐ This party is publicly held.
- ☐ This party has one or more parent entities.

If yes, identify all parent entities, including grandparent and great-grandparent entities.

- ☐ This party has one or more subsidiaries.

If yes, identify all subsidiaries.

- ☐ Ten percent or more of the stock of this party is owned by a publicly held corporation or other publicly held entity.

If yes, identify all such owners.

- ☐ This party is a trade association.

If yes, identify all members of the association, their parent entities, and any publicly held companies that own ten percent or more of a member's stock.

**PART III: OTHER INTERESTED PERSONS AND ENTITIES** (all cases)

- ☒ Another person, corporation, or noncorporate entity related to the party—**not already identified through other answers**—has a direct financial interest in the outcome of the litigation.

Ellen Richards is a covered individual under an Employment Practice Liability Policy that FPI Management, Inc. holds. The Policy is issued by:

- Allied World Surplus Lines Insurance Company  
1690 New Britain Avenue, Suite 101, Farmington, Connecticut 06032

- ☐ There are no known interested persons, corporations, or noncorporate entities with a direct financial interest in the outcome of the litigation other than those participating in the case.

**Any additional pertinent information should also be provided on attached page(s).**

**DATED** this 24th day of February, 2025.

Signature: /s/ Brooks R. Cain

Printed Name: Brooks Cain

Bar Number: 35568

Firm Name: O'Hagan Meyer

Address: 411 East Franklin Street, Suite 500

City, State, Zip Code: Richmond, VA 23219

Phone/Fax: (804) 403-7100 / (804) 237-0250

Email Address: bcain@ohaganmeyer.com

### **CERTIFICATE OF SERVICE**

I hereby certify that on 24<sup>th</sup> of February 2025, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

/s/ Brooks R. Cain

Signature